

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

PROSPECT MEDICAL HOLDINGS, INC., *et al.*,<sup>1</sup>  
  
Debtors.

Chapter 11

Case No. 25-80002 (SGJ)  
  
(Jointly Administered)

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PROSPECT CCMC, LLC, *et al.*,<sup>2</sup>

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official  
capacity as Secretary, United States Department of  
Health and Human Services; and MEHMET OZ, in  
his official capacity as Administrator, Centers For  
Medicare and Medicaid Services,

Defendants.

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Adv. Proc. No. 25-08009 (SGJ)

**APPENDIX IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS COMPLAINT**

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://omniagentsolutions.com/Prospect>. The Debtors' mailing address is 3824 Hughes Ave., Culver City, CA 90232.

<sup>2</sup> The Plaintiffs in this adversary proceeding are Prospect Penn, LLC; Prospect Crozer, LLC; Prospect CCMC, LLC; Prospect DCMH, LLC; Prospect Crozer Urgent Care, LLC; Prospect Penn Health Club, LLC; Prospect Crozer Home Health and Hospice, LLC; Prospect Crozer Ambulatory Surgery, LLC; Prospect Health Services PA, Inc.; and Prospect Provider Group PA, LLC.

<u>Exhibit No.</u>	<u>Description</u>	<u>App. No.</u>
A	March 6, 2025 Status Conference Transcript	1-55
B	Crozer-Chester Medical Center Website	56-59
C	CMS Notification of Termination	60-64
D	July 7, 2025 Request for Hearing to Departmental Appeals Board	65-74

Dated: August 19, 2025

Respectfully submitted,

BRETT A. SHUMATE  
Assistant Attorney General  
Civil Division

/s/ Jae Won Ha  
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**CERTIFICATE OF SERVICE**

I certify that on August 19, 2025, a true and correct copy of the foregoing was served via electronic means through transmission facilities from the Court upon those parties authorized to participate and access the Electronic Filing System in the above-captioned case.

Dated: August 19, 2025

/s/ Jae Won Ha  
JAE WON HA